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NAVAL POSTGRADUATE SCHOOL

MONTEREY, CALIFORNIA

THESIS

THE HOTEL INDUSTRY'S ROLE IN COMBATTING SEX TRAFFICKING

by

Brandon R. Winters

December 2017

Thesis Advisor:
Second Reader:

Carolyn Halladay
Robert Looney

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THE HOTEL INDUSTRY'S ROLE IN COMBATTING SEX TRAFFICKING

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Submitted in partial fulfillment of the
requirements for the degree of

**MASTER OF ARTS IN SECURITY STUDIES
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from the

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ABSTRACT

Human trafficking is a global concern that victimizes countless individuals worldwide. The hotel industry, which traffickers often exploit, is in a unique position to assist in the prevention of sex trafficking; therefore, it plays a vital role in the overall fight against human trafficking. This thesis applies policy analysis and exploratory research to understand how and to what degree the U.S.-based hotel industry can affect efforts to combat sex trafficking.

The results indicate that hotels take a proactive, zero-tolerance stance on human trafficking. Efforts consist primarily of training employees how to identify and report suspected trafficking activities; adopting corporate anti-human trafficking policies; developing key partnerships with non-governmental organizations and government agencies; and supporting programs that help recovering victims gain employment opportunities. Recommendations to improve future efforts include mandating awareness training for all hotel and motel properties, increasing transparency of efforts through annual reporting, and introducing an incentive-based reporting program for the hospitality industry.

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LIST OF ACRONYMS AND ABBREVIATIONS

AB 260	Assembly Bill 260
ACTeams	Anti-Trafficking Coordination Teams
AHLA	American Hotel and Lodging Association
BLI	Blue Lightning Initiative
BSR	Business for Social Responsibility
CIA	Central Intelligence Agency
CSR	Corporate Social Responsibility
CBP	Customs Border Patrol
DHS	Department of Homeland Security
ECPAT	End Child Prostitution, Child Pornography and Trafficking of Children for Sexual Purposes
FBI	Federal Bureau of Investigations
IHG	InterContinental Hotel Group
ITP	International Tourism Partnership
HUMINT	Human Intelligence
MTA	Metropolitan Transportation Authority
NGO	Non-Governmental Organization
NHTRC	National Human Trafficking Resource Center
NSPD-22	National Security Presidential Directive 22
OECD	Organization for Economic Cooperation and Development
SB 225	Senate Bill 225
SB 270	Senate Bill 270
TIP	Trafficking in Persons
TVPA	Trafficking Victims Protection Act
WTO	World Tourism Organization
WTTC	World Travel and Tourism Council
YCI	Youth Career Initiative

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I. INTRODUCTION

Human trafficking is a global concern, which has victimized approximately 21 million individuals worldwide and provides profits to criminals in excess of \$150 billion annually.¹ According to the 2016 National Human Trafficking Resource Center (NHTRC) report, sex trafficking accounted for 76.8 percent of human trafficking reports in the United States, followed by labor trafficking at 14 percent.² The hotel industry, which traffickers often exploit, is in a unique position to assist in the prevention of sex trafficking; therefore, it plays a vital role in the overall fight against human trafficking. While ample anti-trafficking literature addresses broad, overarching strategic initiatives, this thesis focuses on exploring how and to what degree the U.S.-based hotel industry can affect efforts to combat sex trafficking.

A. SIGNIFICANCE OF THE RESEARCH QUESTION

The hotel industry holds great potential to provide a significant impact in the fight against sex trafficking. Hotels and motels offer the critical means necessary to advance domestic and transnational trafficking policies set forth by the U.S. Department of State and the United Nations, thus, increasing the policies' overall effectiveness and decreasing the number of victims suffering from this crime.

According to 2016 National Human Trafficking Hotline statistics, hotels and motels are the top reported venue, even over commercial-front brothels, where sex trafficking acts occur.³ This unique relationship between the hotel and trafficking actors provides countless interaction opportunities to identify and report potential crimes. Additionally, if the hotel industry proved to be an effective mean to combat sex trafficking, its efforts would have massive effects. Hotels and motels are located throughout the United States in nearly every city, accounting for more than 53,400

¹ International Labour Organization, "Forced Labour, Human Trafficking and Slavery," accessed February 17, 2017, <http://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>.

² National Human Trafficking Hotline, "2016 National Human Trafficking Hotline Statistics," accessed February 17, 2017, <https://polarisproject.org/resources/2016-hotline-statistics>.

³ Ibid.

properties and 1.9 million employees.⁴ With a footprint of this magnitude and the industries' interconnectedness, the hotel industry provides great strategic value to the current U.S. anti-trafficking efforts.

Utilizing a cooperative approach, this thesis seeks to expand the academic field by exploring how the hotel industry can support national-level policy. Additionally, this analysis provides the ability to identify gaps in the literature and more importantly in the implementation process. By confronting real-world issues and merging two unique academic fields, hospitality and security studies, this thesis will provide a compelling strategy for combatting sex trafficking.

B. LITERATURE REVIEW

Human trafficking issues have expanded over recent decades, and many authorities consider them a threat to national security. On December 16, 2002, President George W. Bush signed the National Security Presidential Directive 22 (NSPD-22), which called upon federal agencies to drastically increase their efforts, both domestic and abroad, to combat the crime of trafficking in persons.⁵ In doing so, President Bush clearly identifies human trafficking as a serious threat to national security. Since then, numerous initiatives such as the Department of Homeland Security's Blue Campaign and the Department of State's Trafficking in Persons Report have been created to support anti-human trafficking policies. Additionally, recent scholarly research supports the notion that human trafficking is a concern for Homeland Security. Thanh Vo's academic research—which applies an economic supply and demand model to state level anti-human trafficking policies—states that economic profits from human trafficking benefits not only the trafficking criminals, but in some cases terrorist organizations.⁶

⁴ American Hotel and Lodging Association, "Lodging Industry Trends 2015," accessed February 13, 2017, https://www.ahla.com/sites/default/files/Lodging_Industry_Trends_2015.pdf.

⁵ Office of the Press Secretary, "Trafficking in Persons National Security Presidential Directive," February 23, 2003, <https://fas.org/irp/offdocs/nspd/trafpers.html>.

⁶ Thanh N. Vo, "A Business of Security: Applying an Economic Model to Human Trafficking in Oregon" (Calhoun: Naval Postgraduate School, 2016).

The heart of this research question—how and to what degree the hotel industry can affect efforts in combatting sex trafficking—rests on an underpinning assumption that hotel entrepreneurs should take a proactive role in advancing U.S. anti-trafficking objectives. While the primary goal of entrepreneurs is to maximize economic gains, a thorough examination of the existing literature suggests companies must be socially and legally accountable to its stakeholders as well. Managerial strategies including corporate social responsibility (CSR) and recent legislative proposals offer convincing evidence for why the hotel industry should proactively take a stance in the fight against sex trafficking.

1. Defining CSR

The idea of businesses being socially and ethically responsible to their stakeholders—employees, suppliers, investors, consumers, and communities—has been around for decades. Howard Bowen’s book *Social Responsibilities of the Businessman* provides one of the first major scholarly literary works addressing ethical and social business practices as critical components of a business’ overall strategic goals.⁷ Providing one of the first definitions for what is now known as CSR, Bowen posits that social responsibility is “the obligations of businessmen to pursue those policies, to make those decisions, or to follow those lines of action which are desirable in terms of objectives and values of our society.”⁸

Throughout the 1960s and 1970s, as businesses grew into large corporations, Bowen’s ideas gained traction and were expanded upon by numerous experts in the

⁷ Howard R. Bowen, *Social Responsibility of the Businessman* (New York: Harper, 1953).

⁸ Ibid, 6.

field.⁹ Drawing from their perspectives, Archie Carroll put forth a widely accepted definition of corporate social responsibility, which “encompasses the economic, legal, ethical, and discretionary (voluntary) expectations that society has of organizations at a given point in time.”¹⁰ Carroll posits that businesses must first, “produce goods and services that society wants and sell them at a profit”; second, “fulfill its economic mission within the framework of legal requirements”; third, act in an ethical manner that exceeds legal requirements; and fourth, “assume social roles over and above those described thus far.”¹¹ Said succinctly, businesses should serve society and its needs through their economic, legal, ethical and voluntary responsibilities.

As the concepts and practices of CSR developed, non-governmental organizations (NGOs) created guidelines and initiatives to provide direction and implementation assistance. Examples of such guidelines include the United Nation’s Global Compact,¹² the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprise,¹³ and ISO 26000.¹⁴ These documents not only provide corporations with areas of focus (human rights, labor practices, the environment, etc.), but they also present beneficial outcomes for participation. For instance, the international

⁹ Keith Davis, “Can Business Afford to Ignore Social Responsibilities?,” *California Management Review*, 2, no. 3 (1960): 70–76, doi:10.2307/41166246; Edward S. Mason, *The Corporation in Modern Society* (Cambridge, MA: Harvard University Press, 1959); Richard Eells, *Conceptual Foundations of Business* (Homewood, IL: Richard D. Irwing, 1976); Joseph W. McGuire, *Business and Society* (New York: McGraw-Hill, 1963); William T. Greenwood, *Issues in Business and Society* (Boston: Houghton Mifflin, 1964); Earl Frank Cheit, *The Business Establishment* (New York: Wiley, 1964); Henry G. Manne and Henry C. Wallich, *The Modern Corporation and Social Responsibility* (Washington, DC: American Enterprise Institute for Public Policy Research, 1972); George A. Steiner, *Business and Society* (Random House, 1975); Jules Backman, *Social Responsibility and Accountability* (New York: New York University Press, 1975); Robert D. Hay, Edmund R. Gray, and James E. Gates, *Business and Society* (Cincinnati: Southwestern Publishing, 1976); Robert W. Ackerman and Raymond A. Bauer, *Corporate Social Responsiveness* (Reston, VA: Reston Publishing, 1976).

¹⁰ Archie B. Carroll, “A Three-Dimensional Conceptual Model of Corporate Performance,” *The Academy of Management Review* 4, no. 4 (1979): 500, <https://doi.org/10.2307/257850>.

¹¹ Ibid.

¹² United Nations Global Compact, “What You Can Do,” accessed March 9, 2017, <https://www.unglobalcompact.org/take-action/action>.

¹³ Organisation for Economic, “OECD Guidelines on Corporate Governance of State-Owned Enterprises,” OECD.org, accessed March 9, 2017, <http://www.oecd.org/daf/ca/guidelines-corporate-governance-soes.htm>.

¹⁴ International Organization for Standards, “Discovering ISO 26000” (ISO.org), accessed March 6, 2017, https://www.iso.org/files/live/sites/isoorg/files/archive/pdf/en/discovering_iso_26000.pdf.

standard ISO 26000 claims socially responsible acts, such as combatting human trafficking, can positively influence a business's competitive advantage, brand, customer/client/employee retention rates, morale, public relations, and investors' perceptions.¹⁵ These beneficial outcomes further increase the capacity for sustainable growth, which in-turn increases long-term economic gains.

Many companies today hold the same socially accountable perspective that Carroll proposed over thirty years ago. For instance, companies throughout all industrial sectors—such as Barclays Bank, Coca-Cola Company, Disney, General Mills, Facebook, Mattel, and Pfizer Inc.—represent only a fraction of more than 250 corporate members in the nonprofit organization Business for Social Responsibility (BSR). With more than 25 years of experience, BSR works with businesses to address societal issues, which vary over time and differ among industry, with a goal to create a “just and sustainable world.”¹⁶

Additionally, social responsibility, once a fringe concept, has become so popularized in the past decade that companies are now ranked among their peers by how effectively they incorporate and implement CRS into their corporate policies. For example, *Corporate Responsibility Magazine* has created a CRS index called the 100 Best Corporate Citizens that ranks all of the Russell 1000 companies in seven categories:

- environment
- climate change
- employee relations
- human rights
- corporate governance
- financial performance

¹⁵ International Organization for Standards, “Discovering ISO 26000”.

¹⁶ Business for Social Responsibility, “About Us,” accessed March 1, 2017, <https://www.bsr.org/en/about>.

- philanthropy support.¹⁷

For the past two years, Microsoft has earned the top rank in this index by giving back to its communities.¹⁸ Through innovative volunteer grants and matching gift programs, Microsoft and its employees have set the bar in philanthropic giving. Their efforts in 2016 alone amassed \$142 million dollars and 650,000 employee volunteer hours donated to 18,889 schools and nonprofit organizations.¹⁹ With 74 percent of Microsoft's employees contributing to these efforts demonstrates the impacts a corporation can have through generating buy-in to a social need or cause.²⁰

2. CSR in the Hospitality Industry

The practice of corporate social responsibility has become increasingly more prevalent in the hospitality industry over the last three decades. CSR, or more commonly known as corporate sustainability in the hospitality field, is embraced through leading organizations—like the International Tourism Partnership (ITP), the World Tourism Organization (WTO), the World Travel and Tourism Council (WTTC), and the American Hotel and Lodging Association (AHLA)—which address social and environmental concerns by setting industry principles and standards, providing publications, sharing best practices, and educational training. Some creative and effective programs, which assist in promoting and supporting eco-friendly business practices, have emerged from their organizational efforts.

For example, linen and towel reuse programs that offer guests the option to forego daily laundering services are now commonly used throughout the lodging industry to conserve energy and water. According to the American Hotel and Lodging Association, a 300-room hotel—assuming a 72 percent occupancy rate and a 22 percent guest participation rate—can save more than 51,000 gallons of water and \$24,283 annually in

¹⁷ Audrey Roth, "The 100 Best Corporate Citizens," CR Magazine, April 21, 2016, <http://www.thecro.com/100-best/the-100-best-corporate-citizens-2/>.

¹⁸ Ibid.

¹⁹ Microsoft, "Microsoft's 2016 Giving Results," accessed March 3, 2017, <https://www.microsoft.com/en-us/philanthropies/our-employees>.

²⁰ Ibid.

energy, water, and labor costs.²¹ Other environmental saving programs that have been adopted throughout the hotel industry include the installation of low-flow showerheads, water saving toilets, light-emitting diode (LED) lighting, and electronic key cards that reduce energy usage when guests exit their room.²² While some of these programs seem like common sense, they demonstrate how hospitality companies meet social concerns through effective CSR practices and how slight policy adjustments can lead to significant results when compounded throughout the industry.

3. Legal Responsibility

Besides corporate social responsibility, hoteliers must also consider ongoing federal and state legislative changes to ensure their compliance with trafficking laws. Since the passage of the Trafficking Victims Protection Act (TVPA) in 2000, its subsequent amendments (2003, 2005, 2008, and 2013), and multiple campaign launches, many states are now turning to legislative measures to ensure hotels contribute to the fight against human trafficking. For instance, in 2017 California introduced three new bills—the Assembly Bill 260 (AB 260), Senate Bill 225 (SB 225), and Senate Bill 270 (SB 270)—which affect the hotel industry.²³ AB 260 seeks to require all “hotels, motels, inns, bed and breakfasts, and other locations that provides transient lodging, other than personal residences” to display information relating to human trafficking in their establishments; failure to comply would result in civil penalties of \$500 for an initial offense and \$1000 for subsequent offenses.²⁴ SB 225 is similar; however, it adds an additional requirement to provide individuals the option to “text specified nonprofit organizations for services and support” on the posted notices.²⁵ The third bill, SB 270,

²¹ American Hotel and Lodging Association, “Green Guidelines: Towel & Linen Reuse Programs,” accessed March 7, 2017, <https://www.ahla.com/resources/green-guidelines-towel-linen-reuse-programs-0>.

²² Ibid.

²³ Benjamin Ebbink, “Trio of Bills Would Impose Human Trafficking Obligations on Lodging Industry,” Lexology, accessed March 8, 2017, <http://www.lexology.com/library/detail.aspx?g=a153c05c-6f08-4e9e-a78a-befb7050a6ed>.

²⁴ California Legislative Information, “Bill Text - AB-260 Human Trafficking,” accessed March 8, 2017, http://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB260.

²⁵ California Legislative Information, “Bill Text - SB-225 Human Trafficking,” accessed March 8, 2017, http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB225.

would require all hotels and motels, which are “likely to interact or come into contact with victims of human trafficking,” to provide employee training (approved and available through the Department of Justice) in how to recognize signs of and report trafficking concerns.²⁶ While state anti-trafficking bills have been present since 2003, the legislative acts that specifically target the hotel industry suggest hoteliers must now consider legal obligations of what was once considered a voluntary or moral responsibility.

The American Best Value Inn, located in Salisbury, Maryland, provides the most recent example of why hotels and motels should proactively make significant efforts to prevent sex trafficking activities from occurring on their properties. In February 2017, four sex-trafficking victims—who were saved in a 2014 human trafficking bust—filed lawsuits against the American Best Value Inn and its parent company Vantage Hospitality Group.²⁷ According to the lawsuit, the inn had a duty to protect its guests and failed to do so.²⁸ Although this would be one of the first times hotels would be held liable for such charges, laws are in place for this to happen. Under Restatement (Second) Torts §314A, “an innkeeper is under the duty to its guests to take reasonable action to protect them against unreasonable risk of physical harm.”²⁹ Even if the lawsuits fail to penalize the inn, plenty of damage has already been inflicted to the hotel’s brand and reputation from negative media attention sex trafficking produces.

C. POTENTIAL EXPLANATIONS AND HYPOTHESES

The proposed research question is a two-part question. First, it seeks to identify national level anti-trafficking strategy. Second, it explores what specific strategies, if any, are being taken by the hotel industry to decrease sex trafficking on and around its properties and how it aligns with national policy.

²⁶ California Legislative Information, “Bill Text - SB-270 Human Trafficking Recognition and Reporting,” accessed March 8, 2017, http://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB270.

²⁷ Jeremy Cox, “Human-Trafficking Victims Sue Salisbury Hotel,” *Delmarva Daily Times*, accessed March 8, 2017, <http://www.delmarvanow.com/story/news/local/maryland/2017/02/24/human-trafficking-victims-sue-hotel/98347930/>.

²⁸ Ibid.

²⁹ Arthur Best and David W. Barnes, *Basic Tort Law: Cases, Statutes, and Problems* (New York: Aspen Publishers Online, 2007), 507.

My hypothesis is that the hotel industry is proactively playing a role in the fight against sex trafficking. Many of their efforts will involve adopting policies that train employees to recognize and report signs of trafficking to the appropriate authorities. I believe this step might be the most common and effective preventative measure that hotels can implement. Additional measures might include promoting the anti-trafficking cause to its guests, suppliers, and communities to build awareness and develop partnerships with federal and local government agencies to improve collaboration and coordination efforts. Through these proactive measures, hotels will cover their current legal obligations to their guests, serve their stakeholders needs, and reduce the number of people victimized by sex trafficking crimes.

D. RESEARCH DESIGN

The research design for this thesis includes a combination of policy analysis and exploratory research. U.S. anti-trafficking policies and corporate hotel policies will be analyzed using qualitative methods to identify strengths, weaknesses, and potential gaps. Additional exploratory research will be conducted, using a grounded theory methodology, to assist in identifying specific efforts hotels have made to support U.S. anti-trafficking policies.

Primary source materials will largely consist of major hotel corporate policies, U.S. government reports, and non-government organizational literature. Hotel corporate policies will assist in identifying current efforts being taken that support national-level anti-trafficking policies. Government reports, such as the annual *Trafficking in Persons Report*, and NGOs like Polaris and ECPAT-USA, offer the most up-to-date information human trafficking and preventative strategies.

The research for this thesis will be confined to the U.S.-based hotel industry and its efforts within the United States.

E. OBJECTIVE AND CHAPTER OUTLINE

Following the introductory chapter, Chapter II introduces the U.S. anti-human trafficking federal policy by analyzing its components; highlights lead-driven intelligence

collection efforts of DHS; and identifies current NGO efforts that aim to reduce human trafficking. Chapter III seeks to identify major anti-trafficking efforts conducted by the hotel industry by exploring two prominent hotel chains: the Marriott International and Intercontinental Hotels Group. The final chapter, Chapter IV, provides recommendations and conclusions for this research.

II. SEX TRAFFICKING BACKGROUND

To understand how the hotel industry might be able to combat human trafficking, one must first understand the national-level, anti-human trafficking strategies. This chapter introduces the U.S. federal policy by analyzing its components; highlights lead-driven intelligence collection efforts of DHS; and identifies current NGO efforts that seek to reduce human trafficking.

A. FEDERAL POLICY

Vision without action is a daydream. Action without vision is a nightmare.

—Japanese proverb

The *Trafficking in Persons (TIP) Report*, which is updated annually by the U.S. Department of the State, is one of the most informative documents one can reference to understand current government anti-trafficking strategies and efforts. The *TIP Report* is valuable not only for identifying unique tactics governments around the globe are implementing, but also, for ensuring the tactics align with and serve the overall strategies. Current federal policies that aim to reduce human trafficking in the United States are based on three strategic pillars, commonly known as the 3P paradigm. The 3P paradigm focuses on the prosecution of the human trafficking perpetrators, the protection of its victims, and the prevention of future crimes.³⁰ This strategy has been adopted worldwide and is used as a unit of measurement for how active governments are fighting against human trafficking. This section analyzes the 3P paradigm, as it applies to the United States.

³⁰ Department of State, *Trafficking in Persons Report 2017* (Washington, DC: U.S. Department of State Publication, 2017), 1, <https://www.state.gov/documents/organization/271339.pdf>.

1. Prosecution

The first pillar in U.S. anti-trafficking strategy is the prosecution of the perpetrators. One of the most effective actions a government can take to reduce human trafficking is passing strong legislation. According to the *2017 TIP Report*, to successfully prosecute and hold human trafficking criminals accountable for their actions, comprehensive anti-trafficking laws must include

- The criminalization of all forms of trafficking in persons.
- A clear definition of human trafficking that describes the acts, means, and ends, as distinct from related crimes—such as migrant smuggling, prostitution, kidnapping, organ trafficking, or illegal adoption.
- Penalties of imprisonment for the commission of trafficking crimes that are commensurate with those for other serious crimes, such as rape or kidnapping.
- A mandate setting forth clear roles and responsibilities for relevant government agencies or ministries, including with respect to inter-ministerial coordination of anti-trafficking policies.³¹

The United States' Trafficking Victims Protection Act of 2000 (TVPA), and its subsequent amendments and reauthorizations, criminalizes all forms of human trafficking to include sex trafficking, child sex trafficking, forced labor, debt bondage, domestic servitude, and forced child labor.³² Of the many faces human trafficking can depict, sex trafficking tends to be the most prevalent in the United States and is the focus of this thesis. The TVPA provides a clear definition for what constitutes as “severe forms of trafficking in persons”—and is described in the following:

- sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion

³¹ Department of State, *2017 TIPS Report*, 2.

³² *Ibid*, 17.

for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.³³

Penalties for sex trafficking in the United States are strict. In FY2016, the Department of Justice convicted 439 human traffickers (97 percent of the cases involved sex trafficking) with sentencing varying from 12 months to life in prison.³⁴ Additionally, the number of convictions substantially increased over the previous year, which accounted for only 297 DOJ convictions in FY2015.³⁵ To demonstrate how seriously the DOJ takes sex trafficking offenses, one must look no further than its recent convictions. For example, on November 21, 2016, a 52-year-old man from New Paltz, New York, pled guilty to one count of sex trafficking of children and “was sentenced to 218 months (just over 18 years) in prison and a lifetime term of supervised release.”³⁶ On April 5, 2017, a 35-year-old Michigan man was sentenced to 235 months (just over 19 ½ years) imprisonment after pleading guilty on one count of sex trafficking and three counts of interstate transportation for prostitution.³⁷ In March 2017, a 23-year-old young man from Lubbock, Texas, pled guilty to one count of sex trafficking of a child for pimping out his 15-year-old female friend—from June 3 to June 7, 2016—through the website Backpage.³⁸ On July 14, 2017, the young man was sentenced to serve 293 months (over 24 years) in federal prison and must register as a sex offender for the remainder of his life.³⁹ These recent convictions demonstrate the United States’ intolerance of human

³³ Department of State, “Victims of Trafficking and Violence Protection Act of 2000,” 8, accessed September 27, 2017, <https://www.state.gov/documents/organization/10492.pdf>.

³⁴ Department of State, *2017 TIPS Report*, 416.

³⁵ *Ibid.*, 416.

³⁶ Department of Justice, “New Paltz Man Sentenced to More Than 18 Years in Prison for Sex Trafficking of Minors,” accessed September 29, 2017, <https://www.justice.gov/usao-sdny/pr/new-paltz-man-sentenced-more-18-years-prison-sex-trafficking-minors>.

³⁷ Department of Justice, “Michigan Man Sentenced to 235 Months in Prison for Sex Trafficking and Interstate Transportation for Prostitution,” accessed September 29, 2017, <https://www.justice.gov/opa/pr/michigan-man-sentenced-235-months-prison-sex-trafficking-and-interstate-transportation>.

³⁸ Department of Justice, “‘Pimp’ Sentenced to 293 Months in Federal Prison in Child Sex Trafficking Case,” accessed September 29, 2017, <https://www.justice.gov/usao-ndtx/pr/pimp-sentenced-293-months-federal-prison-child-sex-trafficking-case>.

³⁹ *Ibid.*

trafficking and its will to impose severe penalties against those who commit the despicable crime to deter future acts from happening.

While DOJ is responsible for federal prosecution, many agencies assist in investigative roles during the process. In 2011, a Human Trafficking Enhanced Initiative launched to ensure proper coordination and collaboration between multiple agencies.⁴⁰ This initiative launched the creation of Anti-Trafficking Coordination Teams (ACTeams). According to a 2016 U.S. Immigration and Customs report,

ACTeams provide a coordination structure among federal enforcement agencies to eliminate duplication of effort and enhance capacity to identify, investigate, and prosecute human trafficking offenses. Each team serves under the joint interagency leadership of the U.S. Attorney for the relevant judicial district and the highest-ranking official of each federal investigative agency in the regional field offices of the FBI, ICE, and DOL, and each ACTeam coordinates closely with anti-trafficking subject matter experts in DOJ's Human Trafficking Prosecution Unit and FBI, ICE, and DOL headquarters.⁴¹

In July 2011, with guidance from a DOJ-led Federal Enforcement Working Group, Phase I of the ACTeams launched in the Northern District of Georgia, Central District of California, Southern District of Florida, Western District of Missouri, Western District of Tennessee, and Western District of Texas.⁴² The significant increase in Phase I districts' conviction numbers over the rest of the nation demonstrated the success of the ACTeams. For instance, defendants charged with human trafficking from 2012 to 2013 increased by 114 percent in districts with ACTeams compared to only a 12 percent increase in districts without.⁴³ Additionally, the number of traffickers convicted realized a substantial increase as well. During the same reporting period, convictions increased by 86 percent in districts with ACTeams compared to only 14 percent without.⁴⁴

⁴⁰ U.S. Immigrations and Customs Enforcement, "Anti-Trafficking Coordination Teams," October 21, 2016, 2, <https://www.dhs.gov/sites/default/files/publications/ICE%20-%20Anti-Trafficking%20Coordination%20Teams.pdf>.

⁴¹ Ibid, 2.

⁴² Ibid, 2-3.

⁴³ Ibid, 3.

⁴⁴ Ibid, 4.

Due to the initial success of the ACTeams, Phase II was implemented in December 2015, which added an additional six teams in the following areas:

- Cleveland, Ohio
- Minneapolis, Minnesota
- Newark, New Jersey
- Portland, Maine
- Portland, Oregon
- Sacramento, California⁴⁵

To date, ACTeams have proven effective in increasing conviction rates and coordinating multi-agency efforts. Additional teams throughout the country will likely provide greater ability to investigate and prosecute human trafficking crimes.

Prosecution is an important component of the United States' strategy to curb human trafficking. Passing comprehensive anti-trafficking legislation that targets all forms of trafficking, provides clear definitions of the crime, imposes strict penalties to deter future acts, and coordinates multi-agency efforts is critical to the improving U.S. conviction rates and provides the necessary foundation for future legal efforts.

2. Protection

The second pillar of the U.S. anti-trafficking strategy is providing protection to the victims. The United States uses a victim-centered approach that “seeks to minimize re-traumatization associated with involvement in the criminal justice process by providing the support of victim service providers, empowering survivors as engaged participants in the process, and providing survivors an opportunity to play a role in seeing their traffickers brought to justice.”⁴⁶ This approach not only assists with obtaining vital testimony against the victims' perpetrators, but also more importantly, enables victims a smoother and more expeditious recovery. Additionally, once recovered, victims often

⁴⁵ U.S. Immigrations and Customs Enforcement, “Anti-Trafficking Coordination Teams,” 4.

⁴⁶ Department of State, *2017 TIPS Report*, 30.

give back by working alongside anti-trafficking organizations, assisting with training, and advocating for the cause.

In FY2016, the DOJ provided \$19.7 million in funding—which represents an increase of \$5.9 million over FY2015—to 33 victim service providers.⁴⁷ Government funding offers agencies and NGOs the ability to provide victims services such as:

- Case management and referrals for medical and dental care
- Mental health and substance abuse treatment
- Sustenance and shelter
- Translation and interpretation services
- Immigration and legal assistance
- Employment and training
- Transportation assistance
- Criminal justice advocacy⁴⁸

Victim services are in strong demand. According to the 2017 TIP Report, “from July 1, 2015 to June 30, 2016, DOJ grantees providing victim services reported 5,655 open client cases, including 3,195 new clients, compared with 3,889 open client cases and 2,180 new clients the year before and a respective 2,782 and 1,366 the year before that.”⁴⁹ Additionally, victims receiving the government-funded services in FY2016 represented 66 percent U.S. citizens or lawful permanent residences and 34 percent foreign nationals.⁵⁰ These statistics highlight a sharp increase in use and a continued necessity for victim services in the United States.

Victims brought to the United States to perform illegal human trafficking acts must often deal with issues of deportation. However, programs offered by federal law enforcement officials such as Continued Presence can provide a two-year, temporary

⁴⁷ Department of State, *2017 TIPS Report*, 417.

⁴⁸ *Ibid*, 416.

⁴⁹ *Ibid*, 417.

⁵⁰ *Ibid*, 417.

immigration status to victims who are possible witnesses to the crime and can assist in the prosecution.⁵¹ In 2016, DHS granted 129 Continued Presence applications and granted extensions to an additional 179 previously accepted applicants.⁵² Other, longer-term forms of relief available to victims are T-visa and U-visa status. Under these visas, victims can “remain in the U.S. for up to four years” and apply for legal permanent status thereafter.⁵³ To be eligible, victims must cooperate with law enforcement requests and “demonstrate that they would suffer extreme hardship involving unusual or severe harm upon removal from the United States.”⁵⁴ In FY2016, DHS issued 750 victims and 986 family members T-visas, again, an increase over FY2015 numbers of 610 and 695 respectively.⁵⁵

Providing services to victims has its challenges beyond funding, staffing, and coordination. One of the most important keys to protecting victims is the early identification of trafficking victims. Identifying victims in the early stages is critical to prevent re-victimization and to assist in the recovery process.⁵⁶ If law enforcement fails to properly identify victims early in the investigation, victims often become criminalized for their actions and their legal records are negatively impacted. Thus, the ability for victims to transition and obtain necessary housing and employment opportunities becomes greatly diminished.

3. Prevention

The third, and last, pillar of U.S. anti-trafficking strategy is prevention. The federal government aims to prevent future human trafficking acts primarily through public awareness and training. Many programs, initiatives, and campaigns have been

⁵¹ Department of State, *2017 TIPS Report*, 418.

⁵² Ibid.

⁵³ U.S. Immigrations and Customs Enforcement, “Continued Presence: Temporary Immigration Status for Victims of Human Trafficking,” August 2010, <https://www.ice.gov/doclib/human-trafficking/pdf/continued-presence.pdf>.

⁵⁴ Department of State, *2017 TIPS Report*, 417.

⁵⁵ Ibid, 418.

⁵⁶ Department of State, *Trafficking in Persons Report 2016* (Washington, DC: U.S. Department of State Publication, 2016), 27, <https://www.state.gov/documents/organization/258876.pdf>.

launched by the U.S. government to increase awareness. DHS, DOT, DOD, HHS, and the DOS are a few of the many federal departments that require its employees and contractors to receive human trafficking training.⁵⁷ Essentially, this training hedges the use of the mass population (through public awareness) to collect intelligence on suspicious trafficking activity and report it. Without intelligence, federal, state, and local authorities would be incapable of preventing future crimes. Therefore, developing an awareness of human trafficking issues, understanding its signs, and knowing appropriate reporting procedures are critical to preventing future acts.

B. FEDERAL INTELLIGENCE COLLECTION

Intelligence collection is one of the most critical roles that federal agencies—such as the Department of Homeland Security, the Federal Bureau of Investigations, and Central Intelligence Agency—provide to prevent or curb acts that jeopardize U.S. national interests. Intelligence gathering can be derived from a wide variety of sources to include but not limited to signals intelligence, open-source intelligence, geospatial intelligence, which also consists of imagery intelligence, and human intelligence (HUMINT). HUMINT, according to the CIA, is “any information that can be gathered from human sources.”⁵⁸ Some traditional means for collecting HUMINT include clandestine operations, debriefings of foreign nationals, and overt collection through daily human contact.⁵⁹ While traditional methods often take place and target international actors, recent expanded efforts now include domestic HUMINT gathering. Anti-trafficking prosecution and prevention efforts often rely on HUMINT collected by the general public. This section provides the background on two Department of Homeland Security efforts—the Blue Campaign and the Blue Lightning Initiative—and how they seek to gather lead-generating intelligence through training sector specific industries.

⁵⁷ Department of State, *2017 TIPS Report*, 418–19.

⁵⁸ Central Intelligence Agency, “INTElligence: Human Intelligence,” accessed June 11, 2017, <https://www.cia.gov/news-information/featured-story-archive/2010-featured-story-archive/intelligence-human-intelligence.html>.

⁵⁹ *Ibid.*

1. “If You See Something, Say Something”

In the aftermath of the 9/11 attacks, the New York Metropolitan Transportation Authority (MTA) launched an “If You See Something, Say Something” campaign that requested U.S. citizens be vigilant of and report any suspicious activities that may relate to terrorism to the appropriate authorities. Over the next eight years the MTA’s slogan and campaign thrived, and in July 2010, the Department of Homeland Security—in support of the U.S. Department of Justice’s Nationwide Suspicious Activity Reporting Initiative—relaunched the “If You See Something, Say Something” campaign nationwide.⁶⁰ According to DHS, the campaign’s objective is “to raise public awareness of the indicators of terrorism and terrorism-related crime, as well as the importance of reporting suspicious activity to the proper state and local authorities.”⁶¹ Beyond raising awareness and providing education on terrorism, DHS’s campaign essentially leverages the U.S. populace to act as HUMINT collection sources for suspicious activities throughout the country. Additionally, DHS partners with state, local, tribal, and territorial (SLTT) governments and private sector industry leaders to coordinate its efforts; provide a unified message and direction; open lines-of-communication for information sharing; and establish proper reporting procedures.⁶² Matt Mayer, a former DHS senior official, highlights the importance of partnerships with local agencies stating that “local law enforcement, given its deep community ties and frontline role in thwarting terrorist planning, is ideally positioned to use HUMINT methods to detect terrorist activities.” Although it is difficult to measure the “If You See Something, Say Something” campaign’s effectiveness in terms of terrorist acts prevented, it is safe to conclude, based on the yearly increases in hotline calls, that the campaign has successfully increased the public’s awareness and proactive reporting.

⁶⁰ Department of Homeland Security, “If You See Something, Say Something: Campaign Partnership Guide,” accessed June 11, 2017, <https://www.dhs.gov/sites/default/files/publications/SeeSay-Overview508.pdf>.

⁶¹ Ibid, 2.

⁶² Ibid.

2. Blue Campaign

Another DHS intel-driven initiative, which is similar to the “If You See Something, Say Something” anti-terrorism campaign, but instead aims to combat human trafficking, is the Blue Campaign. The Blue Campaign, which also launched in 2010, “strives to protect the basic right of freedom and to bring those who exploit human lives to justice...[by] working in collaboration with law enforcement, government, non-governmental and private organizations.”⁶³ Like the anti-terrorism campaign, the Blue Campaign seeks to provide education and build awareness for identification and reporting purposes. The Federal Law Enforcement Training Center, under the Blue Campaign’s direction, provides federal law enforcement professionals—such as the U.S. Customs Border Patrol (CBP) agency—the training and expertise needed to understand what the signs are and the likely locations in which the trafficking crimes occur.⁶⁴ CBP, with over 60,000 employees, is the largest federal law enforcement agency and is ideally situated to assist in preventing human traffickers from entering our nation’s borders and ports.

The Blue Campaign also provides education that specifically targets the hotel and motel industry. DHS created a specialist “Hospitality Toolkit,” which can be downloaded (www.dhs.gov/blue-campaign/materials/toolkits), printed, and displayed in lodging establishments. The toolkit provides hotel staff with quick reference posters on the general indicators of traffickers and their victims.⁶⁵ Additionally, the resources are tailored to the particular staffing position held. For example, DHS offers posters (see Figure 2) that specifically address “hotel and motel staff; housekeeping, maintenance and room staff; concierge, bellman, front desk, security and valet staff; and the food and beverage staff.”⁶⁶

⁶³ Department of Homeland Security, “About the Blue Campaign,” accessed June 12, 2017, <https://www.dhs.gov/blue-campaign/about-blue-campaign>.

⁶⁴ Ibid.

⁶⁵ Department of Homeland Security, “Blue Campaign Toolkits,” accessed June 13, 2017, <https://www.dhs.gov/blue-campaign/materials/toolkits>.

⁶⁶ Ibid.

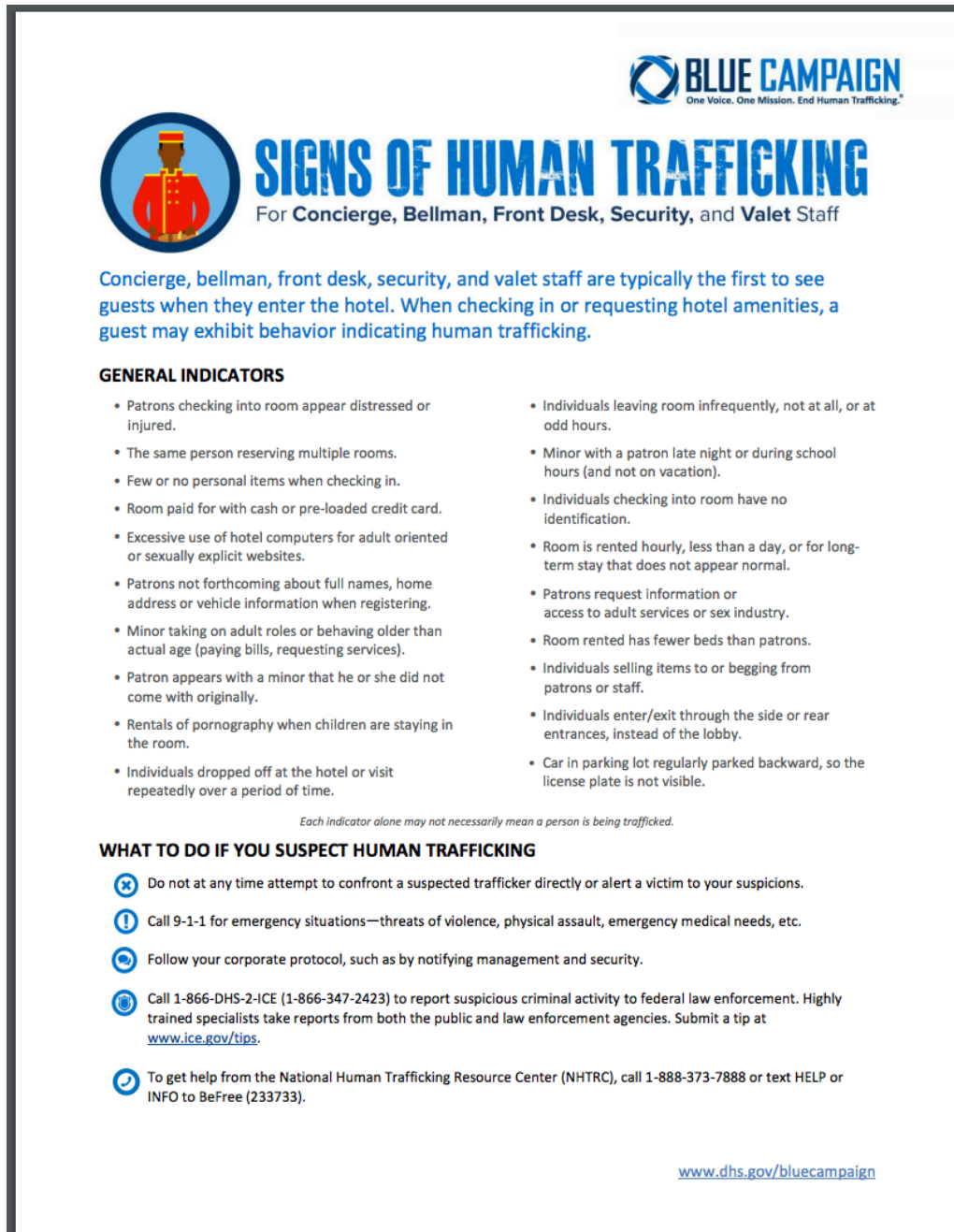


Figure 1. Blue Campaign Toolkit Printout.⁶⁷

As each staff position works in different locations around the hotel property, the general indicators of what to be attentive towards may differ. For instance, DHS recommends that front desk staff be vigilant of guests that have “few or no personal items

⁶⁷ Source: Department of Homeland Security, “Blue Campaign Toolkits,” 5.

when checking in...room paid for with cash or pre-loaded credit card...patrons not forthcoming about full names, home address or vehicle information when registering...[and/or] rentals of pornography when children are staying in the room.”⁶⁸ Conversely, housekeeping and room service staff should be alert to indicators such as “requests room or housekeeping services (additional towels, new linens, etc.), but denies hotel/motel staff entry into room...excessive amounts of cash in a room...[and/or] excessive amounts of sex paraphernalia in rooms (condoms, lubricant, lotion, etc.).”⁶⁹ In addition to providing general indicators, the posters also address what to do in the event trafficking is suspected.

Law enforcement officials and hotel/motel employees represent only a portion of the groups that the DHS Blue Campaign targets to assist in the prevention of human trafficking. DHS, CBP, and the Department of Transportation jointly created a Blue Lightning Initiative (BLI), which aims combat sex trafficking through efforts in the aviation industry.⁷⁰ The Blue Lightning Initiative trains airline pilots, flight crew members, ground support, and customer support personnel on how to identify and report potential human trafficking activities.⁷¹ As of July 15, 2016—following President Barack Obama’s signing of the FAA Extension, Safety, and Security Act of 2016—BLI training is now a mandatory annual requirement.⁷² To date, BLI has provided training to more than 70,000 aviation personnel.⁷³ Additionally, to extend its education and awareness to the airline customers, the Blue Campaign offers downloadable posters, pamphlets, and infographics to the airlines as well to display throughout the aircraft cabins and for viewing during the pre-flight safety videos.⁷⁴ While national level initiatives like the Blue Campaign and BLI are crucial in combatting human trafficking, many supporting

⁶⁸ Department of Homeland Security, “Blue Campaign Toolkits,” 5.

⁶⁹ Ibid, 4.

⁷⁰ U.S. Customs and Border Protection, “Blue Lightning,” accessed June 12, 2017, <https://www.cbp.gov/border-security/human-trafficking/blue-lightning>.

⁷¹ Ibid.

⁷² Ibid.

⁷³ Ibid.

⁷⁴ Ibid.

non-governmental organizations and private sector industries provide valuable services as well.

C. NON-GOVERNMENTAL ORGANIZATION EFFORTS

1. The Polaris Project and ECPAT

Two NGOs that have made major strides in the fight against modern slavery are the Polaris Project and ECPAT (End Child Prostitution, Child Pornography and Trafficking of Children for Sexual Purposes). The Polaris Project, based out of Washington, DC, is an NGO whose objective is to eradicate human trafficking by applying its 3-part model that includes

1. **Respond** to victims of human trafficking effectively and immediately.
2. **Equip** key stakeholders and communities to address and prevent human trafficking.
3. **Disrupt** the business of human trafficking through targeted campaigns.⁷⁵

The Polaris Project has numerous programs that support these three key actions—respond, equip, and disrupt. The first and most widely known program is the National Human Trafficking Hotline and BeFree text line. Polaris’ toll-free hotline, (888) 373–7888, and text line (233733) have become the U.S. standard for reporting incidents or signs of human trafficking and are found on most anti-trafficking websites, media posters, and handouts.⁷⁶ The hotline is manned “24 hours a day, 7 days a week, in more than 200 languages.”⁷⁷ Once the data is gathered, Polaris employees quickly respond to the trafficking victim’s needs and, when applicable, forward the information on to the appropriate law enforcement agencies. In 2016 alone, the hotline received 26,727 calls, which led to 7,572 human trafficking cases being identified and reported.⁷⁸ Polaris also analyzes and compiles their data in user friendly reports (see Figure 1) to share with

⁷⁵ Polaris, “Theory of Change,” accessed June 12, 2017, <https://polarisproject.org/theory-change>.

⁷⁶ National Human Trafficking Hotline, “National Human Trafficking Hotline,” *PolarisProject.org*, accessed January 20, 2017, <https://polarisproject.org/national-human-trafficking-hotline>.

⁷⁷ Ibid.

⁷⁸ National Human Trafficking Hotline, “2016 National Human Trafficking Hotline Statistics.”

federal, state, and local organizations to raise awareness, support new anti-trafficking initiatives, and assist in passing stricter human trafficking legislation.

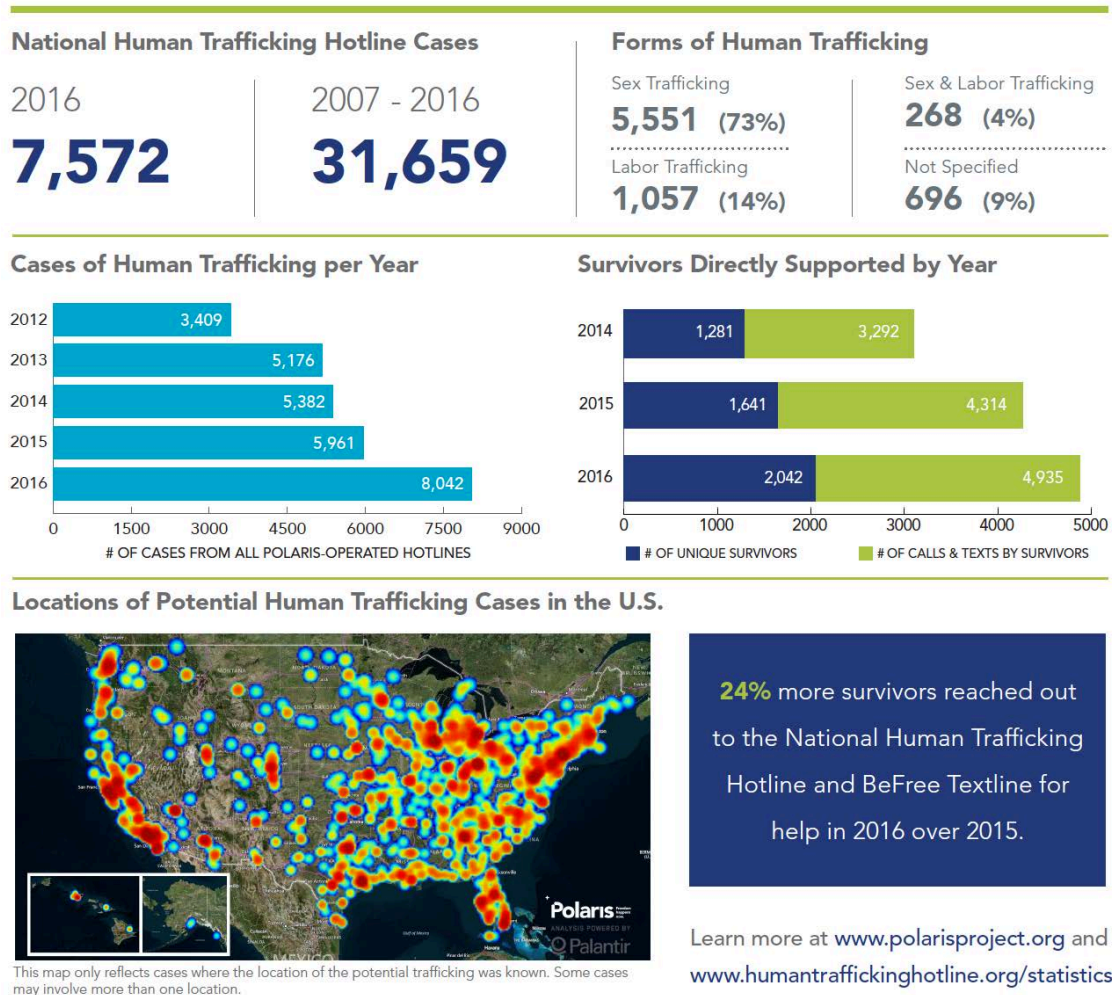


Figure 2. Human Trafficking Statistics Report.⁷⁹

In addition to data analysis and information sharing, Polaris uses their expertise to act as an advisory service to public and private stakeholders. Hotels leaders use Polaris advisory services and its products to assist in decision-making that mitigates risk associated with sex trafficking that could occur in and around their properties. Polaris

⁷⁹ Source: National Human Trafficking Hotline, “2016 National Human Trafficking Hotline Statistics,” 1.

posits, “pimps and traffickers use hotel and motel rooms when setting up so-called ‘dates’ between victims of sex trafficking and those individuals purchasing sex.”⁸⁰ It is a misunderstanding to believe that sex trafficking occurs only in hotels outside of the United States. The extent in which U.S. hotels are directly linked to sex trafficking cases reported to the National Hotline is surprising. From December 2007 to February 2015, Polaris had 1,434 cases of sex trafficking reported in U.S. hotels and motels.⁸¹ Additionally, these cases are not isolated to individual cities or states but spread throughout the nation.

Polaris understands the pivotal role hotels play in combatting human trafficking and therefore provides the industry with recommendations. Polaris’ advice to hotels, which is meant to target both sex and labor trafficking, is to “formally adopt a company-wide anti-trafficking policy, train staff on what to look for and how to respond, establish a safe and secure reporting mechanism, and develop a response plan for your business.”⁸² Again, like the DHS Blue Campaign, Polaris recommendations are primarily focused on the preventive measures such as training hotel employees on identification and reporting processes.

Another NGO that provides training and advisory services is ECPAT-International. ECPAT is a non-profit organization that began in Bangkok, Thailand, in 1990.⁸³ Originally, its goal was to “End Child Prostitution in Asian Tourism,” hence the acronym ECPAT.⁸⁴ Since then, ECPAT’s mission, roles, and networks have greatly expanded. ECPAT now supports 95 civil society organizations in 85 countries to protect children from being sexually exploited by working with international governments, organizations, and the private sector to advocate for and advance children’s rights globally.⁸⁵ In 1997, ECPAT created an American-based branch, located in Brooklyn,

⁸⁰ Polaris, “Human Trafficking and the Hotel Industry,” accessed June 13, 2017, <https://polarisproject.org/resources/human-trafficking-and-hotel-industry>.

⁸¹ Ibid.

⁸² Ibid.

⁸³ ECPAT International, “About ECPAT,” accessed June 13, 2017, <http://www.ecpat.org/about-ecpat/>.

⁸⁴ Ibid.

⁸⁵ Ibid.

New York, titled ECPAT-USA. According to ECPAT-USA, its initial objective was to tackle the sex tourism industry by advocating “legislation [to be] passed that ensured that Americans who traveled abroad to buy sex with minors could be prosecuted in the U.S. for sexually exploiting children in other countries.”⁸⁶ Besides addressing the prosecution aspect of the problem, ECPAT-USA also assists in preventative measures such as training and building awareness.

2. The Code

Created in 1996, The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (simply referred to as The Code) is a joint initiative started by the World Tourism Organization and its industry leaders; and ECPAT and its affiliated organizations.⁸⁷ The Code’s mission, according to its website, is to “provide awareness, tools and support to the tourism industry in order to prevent the sexual exploitation of children in contexts related to travel and tourism.”⁸⁸ To accomplish this mission, The Code requires its members to commit to a set of six criteria. These six criteria include to

1. Establish a policy and procedures against sexual exploitation of children.
2. Train employees in children’s rights, the prevention of sexual exploitation and how to report suspected cases.
3. Include a clause in contracts throughout the value chain stating a common repudiation and zero tolerance policy of sexual exploitation of children.
4. Provide information to travelers on children’s rights, the prevention of sexual exploitation of children and how to report suspected cases.
5. Support, collaborate and engage stakeholders in the prevention of sexual exploitation of children.
6. Report annually on the implementation of The Code.⁸⁹

⁸⁶ ECPAT USA, “Who We Are,” accessed June 13, 2017, <http://ecpatusa.org/who-we-are/>.

⁸⁷ Ibid.

⁸⁸ The Code, “Organisational Structure,” accessed June 13, 2017, <http://www.thecode.org/about/organizational-structure/#mission>.

⁸⁹ The Code, “About,” accessed June 13, 2017, <http://www.thecode.org/about/>.

The aim of these criteria is to create a culture of tourism-related businesses and corporations that are intolerant of these hideous crimes that may occur on their properties or in their supply chains. Additionally, through training and establishing anti-human trafficking policies, employees become aware of the trafficking issues and more likely to report the potential crimes before they take place. More than 300 members have joined The Code to include Hilton Worldwide, which has over 5,000 properties in 103 countries, and Delta Airlines that serves more than 180 million customers annually.⁹⁰ Many companies join because they believe it is simply the right thing to do; some feel it fits well within their values and corporate social responsibilities policies; and others join to access the E-learning training available to its members. Regardless of the reasoning, The Code and its members have furthered ECPAT's mission by incorporating the tourism industry to protect children's human rights.

⁹⁰ The Code, "Why Join," accessed June 13, 2017, <http://www.thecode.org/join/>; Hilton, "About Us," accessed June 13, 2017, <http://hiltonworldwide.com/about/>; Delta, "Corporate Stats and Facts," Delta News Hub, accessed June 13, 2017, <http://news.delta.com/corporate-stats-and-facts>.

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III. HOTEL INDUSTRY’S EFFORTS

To identify what measures hotels are taking to combat sex trafficking requires publicly accessible data. While some data can be hard to obtain, recent laws in Europe have made this data more readily accessible; thus, creating additional layers of transparency concerning hotel efforts. The UK Modern Day Slavery Act of 2015 is a legislative act signed by the United Kingdom Parliament to address the trafficking of human persons in the UK. Part 6, Section 54 of this act necessitates that hotels grossing more than 36 million euros annually are required to publish an annual Slavery and Trafficking Statement.⁹¹ Although not required, this statement may include information on hotel policies, training, due diligence processes, risk assessments and strategies implemented to assist with the prevention of modern slavery and human trafficking.⁹² Analyzing two of the largest hotel chains’—the Marriott International and InterContinental Hotel Group (IHG)—recent Slavery and Trafficking Statements and other supportive literature provides insight into current corporate efforts that are being made in the hotel industry to eradicate sex trafficking.

A. MARRIOTT INTERNATIONAL

Marriott International is currently the largest hotel company worldwide. Marriott International owns and manages “more than 6,000 properties in 122 countries and territories...[with] revenues of more than \$17 billion in fiscal year 2016.”⁹³ Due to its massive scale and current business practices, Marriott International is an ideal corporation to assess anti-trafficking efforts conducted in the hotel sector. Additionally, as the industry leader, Marriott paved the way for other hotel and motels to emulate its proactive and innovative anti-trafficking strategies. This section explores the policies,

⁹¹ Legislation.gov.uk, “Explanatory Notes to Modern Slavery Act 2015,” accessed June 13, 2017, <http://www.legislation.gov.uk/ukpga/2015/30/notes/division/5/6>.

⁹² Ibid.

⁹³ Marriott International, “Marriott Corporate Business Information,” accessed October 11, 2017, <http://www.marriott.com/marriott/aboutmarriott.mi>.

training, and programs that Marriott International implements to combat human trafficking.

1. Corporate Policy

Corporate policy is an essential element for communicating an organization's standards, goals, and direction to its stakeholders. Therefore, to effectively make a stand against sex trafficking, hotels and motels must be willing to openly commit to the objective and communicate it by establishing a clear anti-trafficking policy. Marriott International provides its zero-tolerance position concerning all forms of human trafficking in its policy statements, guiding principles, and conduct guide.

Beginning in 2006, Marriott first established its Human Rights policy to foster a culture that is based on respect for one another.⁹⁴ Although this policy addresses many aspects of human rights such as harassment, ethical conduct, and labor issues, it also specifically addresses human trafficking.⁹⁵ According to Marriott's Principles of Responsible Business policy statement:

Marriott condemns all forms of human trafficking and supports laws duly enacted to prevent and punish such crime, including the exploitation of children. Marriott will continue to raise awareness of this issue and supports programs that help children and their families break out of the cycle of poverty that makes them vulnerable.⁹⁶

Beyond raising awareness and supporting anti-trafficking programs, Marriott makes a commitment "to cooperating, as appropriate, with law enforcement authorities to address any such instances of exploitation."⁹⁷ This step is crucial to the success of the investigation and prosecution processes, which hold perpetrators accountable for their actions.

⁹⁴ Marriott International, "2016 UK Human Trafficking Statement," 1, accessed June 13, 2017, <https://www.marriott.co.uk/Multimedia/PDF/Home%20page/2016%20UK%20Human%20Trafficking%20Statement.pdf>.

⁹⁵ Marriott International, "Human Rights Policy Statement," July 2017, <http://www.marriott.com/Multimedia/PDF/Corporate/HumanRightsStatement.pdf>.

⁹⁶ Marriott International, "Principles of Responsible Business," October 2012, 4, <http://www.marriott.com/Multimedia/PDF/CorporateResponsibility/Principles%20Responsible%20Business.pdf>.

⁹⁷ Marriott International, "Human Rights Policy Statement."

Marriott's Business Conduct Guide also addresses human trafficking and provides direction for reporting any suspicious activities. According to the Business Conduct Guide, "if you suspect that our property is being used for illegal purposes or in a way that does not respect human dignity, or if you believe that an associate's conduct is inconsistent with this policy, report your concerns immediately."⁹⁸ To make reporting user friendly, Marriott created its own "Business Integrity Hotline," which is manned 24 hours a day, 7 days a week.⁹⁹ Also, Marriott provides an email address, fax number, and links to online forms as additional means for reporting.¹⁰⁰ Furthermore, to collect and respond in a timely manner to any security incidents that occur on the hotel properties, Marriott developed its own reporting application. The Marriott Incident Reporting Application automatically flags incidents, such as human trafficking, in the system for immediate response.¹⁰¹ Finally, to ensure employees feel safe reporting signs of suspicious activity, Marriott has implemented non-retaliation policies.

Marriott policies not only require its employees and associates to commit to safeguarding human rights, but also contractually hold its contractors and supply chain to the same ethical standards.¹⁰² While many supply chain concerns relate to child and forced labor issues, communicating a zero-tolerance stance of all forms of human trafficking increases awareness and promotes responsible business practices throughout the vendors' industries as well. Therefore, making a stance further reduces the acceptability levels for issues like sex trafficking to occur in or around the workplace.

As a leader in the hotel industry, Marriott International's policies are often used as a guide for other hotels when creating its new policies. Although Marriott is not a member or signatory of ECPAT's initiative The Code, its anti-trafficking policies meet or exceed

⁹⁸ Marriott International, "Business Conduct Guide," 2011, 44, http://files.shareholder.com/downloads/MAR/509713320x0x153737/BC21397A-7576-4F6D-B870-22EDECC6BF9A/conduct_guide.pdf.

⁹⁹ Ibid.

¹⁰⁰ Ibid.

¹⁰¹ Marriott International, "2016 UK Human Trafficking," 2.

¹⁰² Marriott International, "Our Commitment to Human Rights," July 2017, 5, <http://www.marriott.com/Multimedia/PDF/Corporate/HumanRightsCommitment.pdf>.

The Code's requirements and often serve as the industry standard. For instance, the Green Hotelier's *Know How Guide* identified Marriott's human trafficking policies as a "model document" and one that others should emulate.¹⁰³ Additionally, the International Tourism Partnership (ITP) requested Marriott to work with other industry leaders to write the Industry Position Statement on Human Trafficking for hotels around the world.¹⁰⁴ In this position statement, the hotel industry commits itself to three anti-trafficking efforts, which include

- Developing a corporate strategy for an anti-trafficking policy, which will permeate all activities, including supplier codes of conduct, and clear procedures for reporting any suspected incidences.
- Contributing to the prevention of human trafficking, through awareness training and engagement of our employees and guests, where practical.
- Developing and sharing best practice.¹⁰⁵

Corporate strategy is communicated through policy. Marriott's policies are comprehensive and address human trafficking by making a zero-tolerance stance and providing reporting procedures. This thesis will now explore Marriott's awareness training efforts that support its anti-trafficking strategy.

2. Awareness Training

Awareness training is critical for employees and its guests to be able to successfully identify and report suspected sex trafficking activity. According to Marriott's Vice President of Social Responsibility, Mari Synder, "the guiding principle is 'see something, say something.' We want our associates to consider what they learned, trust their instincts, and advise a supervisor or safety and security officer on staff."¹⁰⁶

¹⁰³ International Tourism Partnership, "Know How Guides," *GreenHotelier.org*, October 2016, 5, <http://www.greenhotelier.org/wp-content/uploads/2016/10/Know-How-Guide-to-Human-trafficking-in-the-hospitality-industry-2016-update.pdf>.

¹⁰⁴ International Tourism Partnership, "Human Trafficking Position Statement," accessed October 13, 2017, <http://tourismpartnership.org/wp-content/themes/itp-child/assets/files/ITP-Human-Trafficking-Position-Statement.pdf>.

¹⁰⁵ Ibid.

¹⁰⁶ Mari Synder, "Spotlight on: Marriott's Work to End Human Trafficking," Connect Corporate, August 6, 2014, <https://www.collaboratemeetings.com/feature/spotlight-on-marriotts-work-to-end-human-trafficking/>.

Since Marriott implemented its first human rights policy in 2006, many strides have been taken to evolve its education and training efforts.

In 2011, Marriott began conducting awareness training that focused on the sexual exploitation of children and incorporating its human rights policies into its supply chain code of conduct policies.¹⁰⁷ In 2015, Marriott partnered with ECPAT-USA and Polaris to revamp its human rights and trafficking training program to provide a more in-depth and effective interface for its employees.¹⁰⁸ This training, which is the most up-to-date version, requires 30 minutes to complete and delivers the following training objectives:

- Define human trafficking and commercial sexual exploitation of children
- Identify individuals who are most at risk for human trafficking
- Understand the difference between labor and sex trafficking specific to the hotel sector
- Explain the role of hospitality employees in responding to this issue¹⁰⁹

Additionally, the training addresses different positions throughout hotels where signs of trafficking are likely. Employees are trained to identify unique signals trafficking perpetrators and their victims might present during their stay. The positional specific training is comparable to the training offered in DHS's Blue Campaign Hospitality Toolkit.¹¹⁰ After a successful development and launch of the new training program, Marriott gifted its training product to the American Hotel Lodging Educational Institute for further distribution to the AHLA members—which consist of 53,000 lodging properties—and non-members throughout the hotel industry.¹¹¹

As of January 1, 2017, Marriott now requires all of its employees receive human trafficking training. Marriott's proactive approach to human trafficking not only increases

¹⁰⁷ Marriott International, "2016 UK Human Trafficking," 1.

¹⁰⁸ Ibid, 2.

¹⁰⁹ American Hotel and Lodging Educational Institute, "Your Role in Preventing Human Trafficking: Recognize the Signs," accessed October 14, 2017, <https://ahlei.org/Programs/Human-Trafficking/>.

¹¹⁰ Department of Homeland Security, "Blue Campaign Toolkits."

¹¹¹ Alex Jensen, "The Fight Against Human Trafficking at the Olympics Gets Some Surprising Allies," August 4, 2016, <https://mic.com/articles/150573/amid-olympic-rush-brazil-s-hotels-join-the-fight-against-human-trafficking>.

awareness of the issues, but also keeps them ahead of future legal requirements. For example, Connecticut recently passed legislation, Public Act No. 16–71, requiring “the operator of each hotel, motel, inn or similar lodging shall ensure that each employee of such hotel, motel, inn or similar lodging receive training at the time of hire on the (1) recognition of potential victims of human trafficking, and (2) activities commonly associated with human trafficking.”¹¹² The new mandate also requires operators to ensure annually, beginning October 1, 2017, that every employee’s personnel record properly annotates the completion of the training.¹¹³ For Connecticut hotels and motels looking to receive proper and timely training, Marriott International’s human trafficking program is being “offered by Quinnipiac University School of Law, the nonprofit Grace Farms Foundation, the Connecticut Trafficking in Persons Council and the Connecticut Lodging Association” free of charge.¹¹⁴

Marriott extends its awareness training beyond its employees and industry partners. Since 2006, Marriott has provided its guests, via reservation confirmation emails, a brochure created by the United Nations World Tourism Organization, titled *The Responsible Tourist and Traveler*.¹¹⁵ This brochure offers helpful information for travelers about respecting others’ culture, traditions, and environment.¹¹⁶ Additionally, the brochure includes a short segment on human trafficking and reminds guests to “respect human rights. Exploitation in any form conflicts with the fundamental aims of tourism. The sexual exploitation of children is a crime punishable in the destination or at

¹¹² State of Connecticut, “Public Act No. 16-71 AN ACT CONCERNING HUMAN TRAFFICKING,” June 1, 2016, 5, <https://www.cga.ct.gov/2016/act/pa/pdf/2016PA-00071-R00HB-05621-PA.pdf>.

¹¹³ Ibid.

¹¹⁴ ABC News, “Connecticut Hotel Workers Train to Spot Human Trafficking,” June 24, 2017, <http://abcnews.go.com/US/wireStory/connecticut-hotel-workers-train-spot-human-trafficking-48257026>.

¹¹⁵ Marriott International, “Our Commitment to Human Rights,” 4.

¹¹⁶ United Nations World Tourism Organization, “The Responsible Tourist and Traveler Brochure,” 1, accessed October 14, 2017, <http://ethics.unwto.org/sites/all/files/docpdf/responsibletouristbrochureen.pdf>.

the offender's home country.”¹¹⁷ Annually, this message is delivered to over 70 million guests and further increases awareness.¹¹⁸

3. Best Practices

Beyond increasing awareness and training employees in recognizing and reporting signs of human trafficking, Marriott supports additional programs and partnerships that further seek to assist the cause. One innovative program Marriott supports is the Youth Career Initiative (YCI) program. The YCI program is a 24-week educational program that seeks to train and develop at risk young adults, between 18–24 years old, with life and on-the-job skills required to obtain legitimate employment.¹¹⁹ Often, the YCI seeks to enroll rehabilitated sex trafficking victims to assist with their social reintegration process. As of May 2016, the YCI program has led to over 3,000 at-risk youths graduating, to include 60 trafficking victims, with most graduates successfully finding employment opportunities in the hospitality industry.¹²⁰ Also, Marriott assisted the YCI program in securing a \$500,000 five-year grant—which was provided by the U.S. State Department Office to Combat and Monitor Trafficking in Persons—to continue providing at-risk youth educational and employment opportunities.¹²¹ Additionally, Marriott International participates in two other youth education and employment-based opportunity programs, which are similar to the YCI—the Ritz-Carlton's “Succeed through Service” program and the SOS Children's Villages Youth Program.¹²² These programs are important to the fight human trafficking because they, too, provide employment opportunities to at-risk youths and rehabilitated human trafficking victims.

¹¹⁷ Ibid.

¹¹⁸ Marriott International, “Our Commitment to Human Rights,” 4.

¹¹⁹ Raini Hamdi, “Hotel Employment Scheme Offers Victims of Poverty, Human Trafficking a Second Chance at Life,” *Forbes.com*, accessed June 14, 2017, <http://www.forbes.com/sites/hamdiraini/2016/05/11/hotel-employment-scheme-offers-victims-of-poverty-human-trafficking-a-second-chance-at-life/>.

¹²⁰ Ibid.

¹²¹ Marriott International, “Our Commitment to Human Rights,” 3.

¹²² Ibid.

Finally, Marriott International partners with key actors in the anti-human trafficking sphere. According to Marriott International, “Marriott actively cooperates with requests from national, state and local law enforcement agencies around the world to help deter and prevent crimes of sexual exploitation.”¹²³ Not only does this partnership assist with prosecuting perpetrators, but it also builds strong working relationships with enforcement agencies that can help hotels remain current with ever-changing legal requirements and provides them with additional points of contact for future training and reporting. Marriott International also partners with many NGOs to stay up-to-date on human trafficking issues, strategies, and mitigation efforts. These partnerships include but are not limited to AHLA, Polaris, ECPAT, ITP, the United Nations World Tourism Organization, and DHS.

Marriott International’s anti-trafficking policies, training, and programs are proactive and robust. While this section analyzed Marriott International on a corporate level, further analysis of individual brands in its portfolio would provide additional programs and practices that support its overall strategy. Next, this thesis analyzes another giant in the hotel industry—the Intercontinental Hotels Group.

B. INTERCONTINENTAL HOTELS GROUP (IHG)

As of October 2017, the InterContinental Hotels Group (IHG) franchises and manages 5,221 hotels worldwide, which amounts to 777,675 rooms, and has an additional 1,513 hotels set to open.¹²⁴ Holiday Inn, Kimpton, Candlewood Suites and the Crown Plaza represent a few of the 12 brands (see Figure 3) that comprise the IHG portfolio.¹²⁵ This section identifies the policies, training, and programs that the IHG implements to combat human trafficking.

¹²³ Marriott International, “Our Commitment to Human Rights,” 2.

¹²⁴ InterContinental Hotels Group, “Our Global Presence,” accessed October 14, 2017, <https://www.ihgplc.com/about-us/our-global-presence>.

¹²⁵ InterContinental Hotels Group, “Our Brands,” accessed October 16, 2017, <https://www.ihgplc.com:443/our-brands>.



Figure 3. IHG Brands.¹²⁶

1. Corporate Policy

The IHG has human trafficking policies that address three sections of its corporate reach—its employees, suppliers, and franchised hotels. First, IHG employees—which include corporate staff and employees at IHG owned hotels—must adhere to IHG’s Human Rights policy, which includes its stance on human trafficking. The IHG Human Rights policy, which was first established in 2009, is relatively limited in scope compared to Marriott International’s policy. For instance, the IHG current Human Rights policy only addresses sex trafficking in a single bullet simply stating that they “do not support forced and compulsory labour or the exploitation of children.”¹²⁷ However, IHG also addresses human trafficking in its Code of Conduct by restating, “we do not support forced and compulsory labour or the exploitation of children.”¹²⁸ IHG’s Code of Conduct and Marriott International’s Business Conduct Guide provide comparable human trafficking information under the respective human rights sections and both offer multiple means of reporting to its employees with a non-retaliation policy.¹²⁹

Second, IHG has anti-human trafficking policies in-place to influence its supply chain. According to IHG’s 2016 Modern Slavery Statement, the IHG Vendor Code of

¹²⁶ Source: InterContinental Hotels Group, “Our Brands.”

¹²⁷ InterContinental Hotels Group, “Human Rights,” accessed October 14, 2017, <https://www.ihgplc.com:443/responsible-business/our-culture-of-responsible-business/human-rights>.

¹²⁸ InterContinental Hotels Group, “Code of Conduct,” 21, accessed October 15, 2017, <https://www.ihgplc.com/-/media/6C8263F0271F4AECAB19498C03F62740.ashx?la=en>.

¹²⁹ Ibid, 22.

Conduct “sets out the standards under which IHG vendors are expected to operate including in relation to human rights and modern slavery across such areas as voluntary freedom of association, working conditions, forced labour and the exploitation of children.”¹³⁰ From 2015 to 2016, IHG received signatures from 1,600 suppliers on its Vendor Code of Code to further build awareness and responsible business practices concerning human trafficking.¹³¹

Finally, to address IHG’s franchised properties—which today account for approximately 83 percent of IHG’s portfolio or 4,352 hotels—the company updated its policy.¹³² In 2014, IHG mandated that all of its franchisees establish a human rights policy and ensure it is properly displayed in all of their hotels.¹³³ Now, all IHG properties have human rights policies in-place to provide guidance on its anti-trafficking stance.

2. Awareness Training

IHG offers human trafficking awareness training to its colleagues in three forms. First, a human rights e-learning module was developed by IHG in 2015 to provide its hotel employees training required to meet company standards. According to IHG’s 2016 Modern Slavery Statement, IHG “asked all our managed hotels to take this training and have made it available to all our franchised hotels.”¹³⁴ Based on IHG’s verbiage, it seems IHG currently has no requirements for the human rights training; instead, IHG merely asks or makes the training available to its hotels. While hard requirements might not exist, IHG does boast that more than 27,000 employees have completed the e-learning training between 2015 and 2016.¹³⁵ The second form of awareness training IHG offers is a 10-minute trainer session that provides employees face-to-face human trafficking training. The last form of training is a poster IHG created, which is meant to be displayed

¹³⁰ InterContinental Hotels Group, “Modern Slavery Statement 2016,” 1, accessed October 14, 2017, <https://www.ihgplc.com:443/responsible-business/our-people/modern-slavery>.

¹³¹ Ibid, 2.

¹³² InterContinental Hotels Group, “Our Global Presence.”

¹³³ InterContinental Hotels Group, “Modern Slavery Statement 2016,” 1.

¹³⁴ Ibid, 2.

¹³⁵ Ibid.

in employee places, to build awareness in its employees. IHG states that the poster “asks colleagues to be alert to the risk of human trafficking, explains the key warning signs to watch out for and how to escalate concerns.”¹³⁶

3. Best Practices

IHG’s Best practices for human trafficking consist of risk assessments and key partnerships. In 2013, IHG conducted a comprehensive human trafficking risk assessment.¹³⁷ Four areas of focus used in the assessment included the following:

- Risks of modern slavery affecting colleagues in our own organization [sic] including our hotels,
- Risks of modern slavery occurring in our corporate or hotel supply chains,
- Risks of modern slavery such as human trafficking occurring in or around our IHG branded hotels,
- Risks of modern slavery occurring at different stages of the hotel life cycle and within supply chains of our hotel owners.¹³⁸

The results of this 2013 risk assessment convinced IHG to make human trafficking awareness training a priority, which assisted in the creation of the e-learning training module and human trafficking awareness poster.¹³⁹

IHG also supports anti-trafficking efforts through its partnerships. Like Marriott International, IHG is also a member of the International Tourism Partner Partnership and was one of the hotel industry leaders that assisted with writing the ITP’s Industry Position Statement on Human Trafficking.¹⁴⁰ Additionally, IHG is an active member in working groups for the Business in the Community, Business for Social Responsibility, and the ITP.¹⁴¹ These working groups allow IHG to exchange ideas and business practices with industry peers to create a positive change regarding human rights. Other partnerships that

¹³⁶ InterContinental Hotels Group, “Modern Slavery Statement 2016,” 2.

¹³⁷ Ibid, 1.

¹³⁸ Ibid.

¹³⁹ Ibid, 2.

¹⁴⁰ Ibid.

¹⁴¹ Ibid.

support IHG's anti-human trafficking efforts include funding the Youth Career Initiative program and the Unseen organization. IHG donations to the YCI allowed 14 human trafficking victims—from Kenya, India, and Vietnam—to receive training in the hospitality field to gain future employment.¹⁴² Additionally, the funds paid for workshops to be held to build awareness on human trafficking.¹⁴³ Donations to Unseen—a United Kingdom based charity that fights against modern slavery—assists with awareness training efforts in the hospitality sector and provide employment opportunities to trafficking victims.¹⁴⁴

Overall, IHG's main efforts to combat sex trafficking consist of corporate guidance through policy, awareness training, and key partnerships. Although these lanes of effort are consistent with Marriott International, it seems that the implementation of the efforts is nominal. Simply providing e-learning training without creating any hard requirements for employee completion projects a lack urgency and importance to the cause—to eradicate human trafficking in and around IHG properties.

¹⁴² InterContinental Hotels Group Foundation, "Our Grants," *IHG Foundation*, accessed October 16, 2017, <http://www.ihgfoundation.org/en-gb/our-grants/>.

¹⁴³ Ibid.

¹⁴⁴ Ibid.

IV. CONCLUSION

Based on the research conducted, hotels take a proactive role in combatting sex trafficking, but can do better. While corporate hotels' efforts vary slightly in degree and tactics, overall their efforts are comparable. This chapter concludes the thesis by examining the strategic alignment between U.S national anti-human trafficking policy and corporate hotel efforts; identifying strengths and weaknesses of hotel efforts; and providing recommendations for future efforts.

A. STRATEGIC ALIGNMENT

The key to meeting an objective requires strategic development and implementation. For strategic effectiveness, all levels of operations must understand and develop tactics that align with and serve the overall strategy. The national strategy that seeks to curb human trafficking is based on the three pillars—the prosecution of the perpetrators, the protection of its victims, and the prevention of future human trafficking crimes.¹⁴⁵ The hotel industry proactively implements tactics that serve this 3P paradigm.

First, hotels serve and support the prosecution pillar by developing strong working relationships with government agencies that investigate and prosecute human trafficking crimes. Hotels' willingness to report suspicious activity and assist in the investigative process greatly increases the likelihood of exposing perpetrators and helps build critical evidence needed for successful prosecutions.¹⁴⁶ To deter future acts, perpetrators must be held accountable for their illicit acts and hotels are doing their part by reporting and assisting with investigations.

Second, the national strategy focuses on the protection of human trafficking victims. One barrier recovering trafficking victims must overcome is their ability to obtain legitimate employment. If victims are incapable of financially providing for themselves or their family, they often return to the streets out of economic necessity. Hotels help meet victims' employment needs by offering and funding training programs

¹⁴⁵ Department of State, *2017 TIPS Report*, 1.

¹⁴⁶ Marriott International, "Human Rights Policy Statement."

like the Youth Career Initiative, “Success through Service”, and Unseen.¹⁴⁷ These programs provide opportunities to develop marketable hospitality skills and open doors for future employment opportunities.

Finally, and arguably the most important pillar of the national strategy is the prevention of future human trafficking acts. Throughout all industries that combat human trafficking, the primary prevention efforts focus on building public awareness through training. In order to report the crime, one must first be aware of its existence, prevalence, and visible signs. The hotel industry addresses these needs by building awareness through its corporate and company-wide anti-human trafficking policies and conducting awareness training. Table 1 provides an alignment comparison between national strategy and current anti-trafficking efforts conducted by Marriott International and Intercontinental Hotels Group.

Table 1. Hotel Efforts’ Relationship to National Strategy

Current Efforts	U.S. Strategy - 3P Paradigm		
	Prosecution	Protection	Prevention
Marriott International			
Corporate Anti-Human Trafficking Policies			X
Marriott Incident Reporting Application (MIRA)	X		X
Requires Human Trafficking Awareness Training			X
Hosts and Funds the Youth Career Initiative (YCI)		X	
"Success Through Service" Program		X	
Key Partnerships (Governmental and NGO)	X		X
Intercontinental Hotels Group (IHG)			
Corporate Anti-Human Trafficking Policies			X
Provides Human Trafficking Awareness Training			X
Donates to Youth Career Initiative (YCI)		X	
Key Partnerships (Governmental and NGO)	X		X

¹⁴⁷ Marriott International, “Our Commitment to Human Rights,” 3; InterContinental Hotels Group Foundation, “Our Grants.”

Overall, the U.S. hotel industry takes a proactive, zero-tolerance stance on human trafficking. Hoteliers understand their legal obligations of protecting their guests from the dangerous environment that surrounds human trafficking and have pre-emptively made efforts to combat sex trafficking in and around their properties. The next section critically analyzes current hotel efforts by identifying strengths and weaknesses to highlight areas of focus for follow-on recommendations.

B. STRENGTHS AND WEAKNESSES

An assessment of hotels' anti-trafficking efforts highlights three main strengths—willingness to act, a cooperative and collaborative approach, and the ability to influence external actors. The first strength is that hotels subscribe to the ideas of CRS, also known as corporate sustainability, which provides reason for hotels to act. Without this mindset, few reasons would compel hotels to act beyond their legal obligations. Instead, hoteliers accept a moral and ethical responsibility to do what they can to assist in national and global efforts that combat sex trafficking.

The second strength hotel efforts present is the cooperative and collaborative approach used when addressing trafficking issues. Cooperation between hotels and government agencies build positive working relationships, help facilitate cross-industry training like DHS's Blue Campaign, and open lines of communication for reporting and investigating crimes. Whereas, collaboration efforts between major hotel brands, industry partners, and NGOs not only maximize the quality of products being developed—such as the Hotel Industry's Statement on Human Trafficking—but also, contribute to effectively communicating its zero-tolerance message to the masses. Actively participating in collaborative working groups, which share industry best practices for combatting trafficking, is necessary to ensure continual progress.

The third strength, the hotels' ability to influence external actors, greatly increases awareness building beyond its immediate employees. For example, one method hotels use to extend awareness building to external actors is holding their supply chains to the same high human rights standards that hotel employees are held to. Another method of projecting anti-trafficking messages, thus building awareness, is by sending hotel guests

informational brochures like *The Responsible Tourist and Traveler*.¹⁴⁸ This practice increases the operational reach of hotel efforts by millions with minimal to no costs to the hotelier.

While hotel efforts present many strengths, they also offer a few weaknesses to learn from and build upon. These weaknesses include the lack of internal training mandates, minimal level of transparency regarding specifics of efforts, and zero incentives for employee reporting. First, during the time this research was conducted, few hotels beyond Marriott International required employees to receive human trafficking awareness training. Although it is commendable that IHG and others created and implemented means for training employees on the subject, the absence of self-imposed training requirements demonstrates a lack of priority and necessity. Proactively ensuring employees are aware of the human trafficking issues, prevalence, and signs is critical to the overall prevention strategy. Therefore, training must be mandated at hotel leadership levels.

Second, the available data concerning specifics on hotel anti-trafficking efforts was inadequate. Shareholders and researchers should be able to find qualitative and quantitative details on what actions being taken and results of those actions. Much of the data provided by hotels through its corporate policies, statements, websites, and other literature are generic and lack the information needed for proper assessment. Often, hotels provide input data such as dollar amounts donated towards a cause or the number of employees trained in a given year. While this information is useful, the lack of output data—such as numbers of hotel-reported trafficking incidents over a given timeframe or hotel-reported incidents that led to a conviction—is problematic for assessment purposes.

Finally, the lack of an incentive structure for hotel employee reporting presents an area of improvement. Hoteliers spend time and money training its employees to be able to identify signs of human trafficking activity and report those signs. However, reporting crimes can often place the reporter in awkward and uncomfortable situations. Hotels have provided means for anonymous reporting and implemented non-retaliatory policies to

¹⁴⁸ Marriott International, “Our Commitment to Human Rights,” 4.

help ease the pressures of reporting. Nonetheless, hotels and the government should do more to provide incentives for reporting the suspicious activities.

In summary, hotels efforts present numerous strengths and weaknesses, which should be understood and embraced to improve future efforts. The strengths of current efforts include hotels

- A willingness to act.
- A cooperative and collaborative approach.
- The ability to influence external actors.

Weaknesses identified in hotel efforts include

- Lack of training requirements.
- Transparency of efforts to its shareholders and researchers.
- Lack of incentives for employee reporting.

The next, and final, section of this thesis provides recommendations to improve the weaknesses identified here to continue making meaningful strides in the fight against human trafficking.

C. RECOMMENDATIONS

The recommendations derived from this research are straightforward and are implementable. First, hotels must mandate awareness training at all hotel and motel properties. As part of the follow-on awareness building hotels should mandate the use of the Blue Campaign Hospitality Toolkits posters be displayed in hotel and motel employee spaces. Implementing these two measures would reinforce the hotel's intolerant stance toward human trafficking and provide employees the training needed to be aware of and identify trafficking perpetrators and their victims. Next, hotels must increase the public data available concerning its effort that combat sex trafficking to its shareholders and researchers. Hotels should, if not already doing so, produce an annual report on its efforts to include its policies, actions, and most importantly the results of its actions. While it is

understandably difficult at times to quantify the success or failure of efforts, more attempts must be done. During this research, it was challenging to find literature on how many reports were made by hotel employees and the final outcome of those reports. Polaris provides excellent data for a macro-level assessment, but hotels must proactively report its output data to assist with future analysis of efforts.

The last recommendation is to incentivize employee reporting. Employees are more likely to report suspicious sex trafficking activity—which may put them in uncomfortable situations—if there is a potential to receive a monetary incentive. In the past, the U.S. government has implemented such incentive programs to catch criminals and praised the results. For example, the Rewards for Justice program, started in 1984 by the Department of the State, was instituted to “bring international terrorists to justice and prevent acts of international terrorism against U.S. persons or property.”¹⁴⁹ According to its website, the program has paid out over \$145 million to more than 90 individuals for the reporting information to authorities that prevented potential terrorist activities or prosecuted terrorists.¹⁵⁰ Another incentive-based program that encourages reporting of suspicious activity is the U.S. Securities and Exchange Commission (SEC) Whistleblower program, which began on July 21, 2010. The whistleblower program incentivizes individuals who report fraudulent and other violations to the SEC in exchange for monetary rewards of “10 percent to 30 percent of the money collected when the monetary sanctions exceed \$1 million.”¹⁵¹ As of October 12, 2017, the program has paid out “more than \$162 million has been awarded to 47 whistleblowers.”¹⁵²

The government, hotel corporations, or hotels themselves could implement a similar incentive-based program to increase employee reporting. However, this program could be employed using a much smaller payout scale than that of the two aforementioned programs and still prove effective. In FY2016, the DOJ spent \$19.6

¹⁴⁹ Department of State, “Rewards for Justice - Program Overview,” accessed November 10, 2017, <https://rewardsforjustice.net/english/about-rfj/program-overview.html>.

¹⁵⁰ Ibid.

¹⁵¹ U.S. Securities and Exchange Commission, “SEC Announces Whistleblower Award of More Than a Million Dollars,” October 12, 2017, <https://www.sec.gov/news/press-release/2017-195>.

¹⁵² Ibid.

million funding victim service providers.¹⁵³ If the DOJ, or any other agency, reallocated \$1 million to implement a Hospitality Reporting Program, I believe the reporting rates would drastically increase. Offer \$100,000 for reports that lead to the successful prosecution of sex trafficking perpetrators and then ensure that the payouts and story of the successful captures are widely publicized. This would increase awareness of the new program to other hotel employees as well as send a strong message to the perpetrators. If the incentivized reporting program were implemented at the hotel corporate level or lower than monetary rewards could be reduced (see Table 2) and still prove effective in generating more reports and projecting the hotel’s zero-tolerance stance.

Table 2. Proposed Incentive Structure for Hospitality Reporting Program

Optional Levels of Implementation			
	Government Level	Corporate Level	Brand Level
Payout Caps Per Case*	\$100,000	\$10,000	\$5,000
Annual Program Payout Budget	\$ 1 million	Unlimited**	Unlimited**
* Payouts to employee who reports activity that leads to a perpetrator’s conviction ** If sex trafficking reports led to excessive payout costs. then larger issues must be addressed within the organization			

D. FINAL THOUGHTS

Human trafficking, specifically sex trafficking, is a global issue of massive scale. Combating human trafficking requires collaborative efforts between public and private sectors to effectively implement tactics that serve the 3P paradigm strategy—prosecution, protection, and prevention. The hotel industry, which traffickers often exploit, is in a unique position to assist in combatting sex trafficking; therefore, it plays a vital role in the overall fight against human trafficking.

¹⁵³ Department of State, *2017 TIPS Report*, 417.

The results of this research indicate that hotels take a proactive, zero-tolerance stance on human trafficking. Efforts consist primarily of training employees how to identify and report suspected trafficking activities; adopting corporate anti-human trafficking policies; developing key partnerships with NGO and government agencies; and supporting programs that assist recovering victims gain employment opportunities. Recommendations to improve future efforts could incorporate mandating awareness training for all hotel and motel properties, increase transparency of efforts through annual reporting, and introduce an incentive-based reporting program for the hospitality industry.

The gaps identified, which assisted in the formation of the recommendations, warrant additional exploration. Further academic research focused on incentive-based reporting could prove valuable and provide the foundation for its future implementation. Additionally, as this thesis focused primarily on hotel efforts from a corporate level, further research centered on individual brand level hotel efforts might highlight additional creative and effective practices, which should be shared and implemented. The hotel industry's continued cooperative and collaborative approach is critical to combating sex trafficking and its efforts must continue to be refined to protect human rights within the United States and around the world.

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